

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

MALIBU MEDIA, LLC,

Plaintiff,

v.

DOE, subscriber assigned

IP address 76.16.196.177

Defendant.

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Case No.: 1:13-cv-07297

**DEFENDANT DOE'S (IP ADDRESS 76.16.196.177) COMBINED MOTION TO
PROCEED ANONYMOUSLY AND FOR A PROTECTIVE ORDER**

NOW COMES Defendant, DOE, subscriber assigned IP address 76.16.196.177, by and through his attorneys, Antonelli Law Ltd., respectfully requests this Honorable Court to proceed anonymously and enter a Protective Order prohibiting any party from publicly disclosing any information relating to Defendant that Plaintiff Malibu Media, LLC receives in response to its Rule 45 subpoena issued to Defendant's Internet Service Provider ("ISP"), in support of which he states as follows:

1. Pursuant to Fed. R. Civ. P. Rule 26(c), there is good cause to grant this motion in light of the facts and circumstances of the case against the Defendant.
2. The nature of the specific allegation against Defendant presents a particular need for protecting Defendant from annoyance, embarrassment, oppression, or undue burden or expense due to the pornographic nature of the copyrighted material.
3. No public interest exists in the identity of the Defendant.
4. Pursuant to Fed. R. Civ. P. Rule 26(c), counsel for the Defendant has attempted to confer with Plaintiff's counsel to resolve the dispute.

WHEREFORE, Defendant, subscriber assigned IP address 76.16.196.177, respectfully requests this Court grant this Motion and enter an Order allowing Defendant to appear anonymously and for issuance of a protective order prohibiting the disclosure of Defendant's information.

Respectfully submitted,

By: /s/ Melissa Brabender
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CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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By: /s/ Melissa Brabender
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CERTIFICATE OF COMPLIANCE WITH FED. R. CIV. P. 26(c)

Pursuant to Fed. R. Civ. P. 26(c), counsel for Defendant attempted to confer with Plaintiff's counsel via telephone regarding the relief requested by Defendant and left a voicemail for Plaintiff's counsel on December 2, 2013.

By: /s/ Melissa Brabender
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